

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE ALLERGAN PLC SECURITIES
LITIGATION

Case No. 18 Civ. 12089 (CM)(GWG)

This Document Relates To: All Actions

STIPULATION

WHEREAS, the Court granted on May 20, 2021 (Dkt. No. 221) a request for a one-week extension to submit the privilege log disputes to the Court which was stipulated to by Defendants Allergan plc (“Allergan”), Brenton L. Saunders, Maria Teresa Hilado, Matthew M. Walsh, Frances DeSena, Mark Marmur, Paul Bisaro, and William Meury (together with Allergan, “Defendants”) and Lead Plaintiff Dekalb County Pension Fund (“Plaintiff” and collectively with Defendants, the “Parties”).

WHEREAS, the Parties have continued to engage in good faith negotiations regarding certain challenges Plaintiff has asserted regarding the Defendants’ claims of attorney-client privilege and work product doctrine reflected in privilege logs served by Defendants on Plaintiff, including the exchange of detailed written communications setting out the Parties’ positions, an approximately two-hour telephonic meet and confer on Wednesday May 19, 2021, the exchange of emails reflecting the Parties negotiations, and a telephonic conference held on May 26, 2021 regarding ongoing efforts by Defendants to respond to certain of Plaintiff’s requests regarding certain of Defendants’ privilege claims;

WHEREAS, the Parties have agreed, subject to Court approval, to an additional one-week extension for disputes regarding the Defendants’ privilege logs to be filed with the Court in order to allow for continued negotiations to resolve and/or narrow the issues surrounding the

privilege logs;

IT IS HEREBY STIPULATED AND AGREED that the deadline to submit disputes, if any, regarding the privilege logs is June 2, 2021, and,

IT IS FURTHER STIPULATED AND AGREED that if the Court does not approve this Stipulation for an additional one-week extension, then Plaintiff shall be deemed to have timely submitted its privilege log dispute on May 19, 2021 by way of its application (with exhibits) filed with the Court on that date (“Application”) (Dkt. Nos. 220-1 through 220-8). Also, in the event the Court does not approve this Stipulation for an additional one-week extension, then the Defendants’ time to respond to the Application shall begin to run from the date of the Court’s denial.

Stipulated and agreed to on this 26th day of May, 2021 by:

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Counsel for Defendants

SO ORDERED

Dated: May 27, 2021
New York, New York



GABRIEL W. GORENSTEIN
United States Magistrate Judge